

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

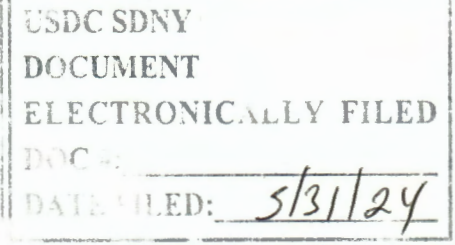
MARSH & MCLENNAN AGENCY, LLC,

Plaintiff,

-against-

ROBERT W. STEDMAN,

Defendant.



Case No.: 24-CV-01671 (LLS)

~~PROPOSED~~ SCHEDULING ORDER

LLS

LOUIS L. STANTON, United States District Judge:

This Civil Case Management Plan (the "Plan") is submitted by the parties in accordance with Fed. R. Civ. P. 26(f)(3).

1. Conference Date and Appearances. The conference pursuant to Fed. R. Civ. P. 16(b) is scheduled on May 31, 2024 at 2:30 p.m. Shawn Matthew Clark and Miguel Lopez will appear for plaintiff, Marsh & McLennan Agency, LLC ("Marsh"). S. Preston Ricardo and Randi Kira Brown will appear for defendant, Robert W. Stedman ("Stedman").
2. Statement of the Issues. Whether Stedman has breached certain post-employment restrictive covenant agreements between him and Marsh by allegedly soliciting and servicing certain clients and employees with whom he worked while employed by Marsh through alleged conduct with respect to those clients and employees while subsequently working for the Northeast Series of Lockton Companies, LLC, and whether he used or disclosed any purported Marsh confidential information in connection with same.
3. Schedule.
 - a. Depositions. Counsel for Marsh will depose Stedman and counsel for Stedman will depose one or more Marsh Rule 30(b)(6) witnesses on designated topics. The parties anticipate conducting additional Marsh and non-party depositions – and to identify such persons – based on the information they obtain during written discovery. The parties will work together in good faith to agree on deposition dates for depositions to be conducted in September and October 2024. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.
 - b. Document Discovery. Initial requests for production of documents shall be served by June 24, 2024. The parties shall produce non-objectionable responsive documents by August 26, 2024.

- c. Expert Discovery. Marsh will supply its expert report to Stedman by November 22, 2024. Stedman will supply its expert report to Marsh by December 23, 2024. Expert depositions shall be completed by January 31, 2025, on dates to be mutually-agreed by the parties.
 - d. Discovery End Date. Discovery shall be completed by January 31, 2025.
 - e. Plaintiff's Pre-Trial Order Materials. Marsh shall supply its pre-trial order materials to Stedman by February 19, 2025.
 - f. Pre-Trial Order. The parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (i) proposed findings of fact and conclusions of law for a non-jury trial, or (ii) proposed voir dire questions and proposed jury instructions, for a jury trial, by March 21, 2025.
 - g. Final Pre-Trial Conference. The Court shall hold a final pre-trial conference pursuant to Fed. R. Civ. P. 16(e) on March 28, 2025, at 2:30 pm LLS
 - h. Extensions of Interim Deadlines. Any of the interim deadlines in Paragraph 3(a) through 3(c) may be extended by the written consent of all parties without application of the Court, provided that all discovery is completed by the date set forth in Paragraph 3(d).
- 4. Discovery Limitations. The parties shall submit for the Court's approval a proposed Protective Order that will govern discovery in this case, and will otherwise conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of United States District Courts for the Southern and Eastern Districts of New York.
 - 5. Disputed Issues Concerning Discovery Limitations. None at this time.
 - 6. Subject(s) of Expert Testimony. The anticipated field of expert discovery is the subject of damages.
 - 7. Trial. Counsel for the parties have conferred and their present best estimate of the length of trial, which shall be to a jury, is 4 days.
 - 8. No Alterations or Amendments. Subject to Paragraph 3(h), this Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires.

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/s/ Shawn Matthew Clark
A. Michael Weber
Shawn Matthew Clark
Miguel A. Lopez
Littler Mendelson, P.C.
Attorneys for Plaintiff
Dated: May 24, 2024

/s/ S. Preston Ricardo
S. Preston Ricardo
Randi Kira Brown
Golenbock Eiseman Assor
Bell & Peskoe LLP
Attorneys for Defendant
May 24, 2024

Dated: May 31 2024
New York, New York

SO ORDERED.

Louis L. Stanton
LOUIS L. STANTON
U. S. D. J.